

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA**

WARREN RICHARDS,
*on behalf of himself and
others similarly situated,*

Plaintiff,

V.

SHEIN DISTRIBUTION CORPORATION

Defendant.

Civil Action No.: 1:25-cv-01385

Class Action Complaint

Jury Trial Demanded

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT’S MOTION TO DISMISS AND MOTION TO STAY**

Plaintiff Warren Richards (“Plaintiff”), with the counsel of the Defendant, respectfully moves the Court for a thirty (30) day extension of time in which to respond to Defendant Shein Distribution Corporation’s pending motions. Defendant’s Motion to Dismiss Pursuant to Rule 12(b)(6), filed on September 2, 2025 (Dkt. 17) Defendant’s Motion to Stay Proceedings Pending Critical Seventh Circuit Appeal, or Alternatively to Stay Discovery Pending the Motion to Dismiss, also filed on September 2, 2025 (Dkt. 19).

Pursuant to Fed. R. Civ. P. 6 and S.D. Ind. L.R. 7-1(c)(2), Plaintiff's responses are presently due within 21 days of service, making the current deadline September 23, 2025. Plaintiff respectfully requests a thirty (30) day extension of time, up to and including October 23, 2025, to file responses to both motions. This extension is necessary to allow Plaintiff's counsel adequate time to review the substantial legal issues raised in both motions, confer with co-counsel and prepare responses that will assist the Court in resolving these threshold issues. The requested extension is modest, sought in good faith, and will not unduly prejudice Defendant. No

other deadlines in this matter will be affected.

In accordance with S.D. Ind. L.R. 6-1, this is Plaintiff's first request for extension of time to respond to these motions.

CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court enter an Order extending the deadline to respond to Defendant's Motion to Dismiss (Dkt. 17) and Motion to Stay (Dkt. 19) by thirty (30) days, to October 23, 2025.

Dated: September 13, 2025

PLAINTIFF, on behalf of himself
and others similarly situated,

/s/ Anthony I. Paronich
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